

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ISAAC PAZ,

Plaintiffs,

v.

PORTFOLIO RECOVERY ASSOCIATES, LLC,

Defendant.

Case No. 1:14-cv-09751

Judge: Elaine E. Bucklo


DEFENDANT'S RULE 68 OFFER OF JUDGMENT

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendant PORTFOLIO RECOVERY ASSOCIATES, LLC ("PRA"), by and through its attorneys, David M. Schultz, Avanti D. Bakane and Lindsey A.L. Conley of Hinshaw & Culbertson LLP, hereby offers to allow judgment to be entered against it in this action, and states as follows:

1. Judgment shall be entered against Defendant in the amount of \$3,501.00 as to Plaintiff arising from Plaintiff's claims against Defendant as alleged in Plaintiff's complaint.
2. Judgment shall also be entered against Defendant for reasonable attorneys' fees and costs through the date of Plaintiff's acceptance of this Offer, in an amount agreed upon between the parties, and if no agreement can be made, to be determined by the Court.
3. This offer of judgment is made solely for the purposes specified in Rule 68 of the Federal Rules of Civil Procedure and is not to be construed as an admission that Defendant is liable in this action, that Plaintiff has suffered any damage, or for any other reason.
4. If this offer is not accepted as provided by Rule 68, it shall be deemed withdrawn and evidence thereof shall not be admissible except in the proceeding to determine costs.

Respectfully Submitted,

PORTFOLIO RECOVERY ASSOCIATES,
LLC, Defendant



Avanti D. Bakane

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CERTIFICATE OF SERVICE

I, the undersigned attorney, hereby certify that that a copy of the **Defendant's Rule 68 Offer of Judgment** was served via Electronic Mail and U.S. Mail, First Class, on March 27, 2015, at or before 5:00 p.m. to the following counsel of record:

Mario Kris Kasalo
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Avanti D. Bakane